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VIA ELECTRONIC MAIL

COLORADO BULLETIN NO.: CO-300-06-05

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SUBJECT: LTP – Water Quality Eligibility Tool Guidance

TO: 2006 Conservation Security Program (CSP) Area and Field offices

PURPOSE: To provide guidance for Natural Resources Conservation Service (NRCS) employees in completing the Water Quality Eligibility Tool for CSP Applicants.

EXPIRATION DATE: September 30, 2006

This bulletin transmits guidance for Natural Resources Conservation Service (NRCS) field staff in completing the Water Quality Eligibility Tool for determining if an applicant meets the minimum water quality criteria for CSP.

The *CSP Water Quality Eligibility Tool* was designed to provide a nationally consistent method for evaluating whether an applicant's offered acres meet the minimum treatment requirements for certain Water Quality Resource Concerns. While this tool is a significant improvement over previous approaches to the subject, the tool is not, and never will be, perfect. It cannot account for all of the varying situations where American landscapes intersect with agricultural land uses and management. There are a number of scenarios where the tool, as presently designed, will not allow an otherwise eligible property to earn enough points to meet one or more of the minimum "point's thresholds" established by committee. Some deserving applications will be denied participation in CSP, unless some adjustments are made to account for the tool's deficiencies.

One example is the "Phosphorus-Groundwater" resource concern. The tool requires four points to earn a "Pass," which doesn't seem like much. However, there are not too many ways to earn points for this concern, especially in winter wheat production areas of the Colorado High Plains. In fact, if soil testing is not done, it's likely that only three points may be earned (*where no phosphorus (P) is applied*)—and the application will fail at this point. Now consider: Is phosphorus in groundwater truly a resource concern on the Colorado High Plains, especially if no phosphorus is applied? The answer is a resounding "No." The High (and Dry) Plains winter wheat production areas do not typically have surface water concerns, let alone groundwater concerns. If a concern does not apply, then it should not be a factor—in conservation planning, in environmental evaluations, or for CSP eligibility. The program manual acknowledges this; the tool does not (for P).

The Water Quality tool committee, after considerable user feedback, created “Pass” options for every concern *except* P. Their reasoning is that there are other sources of phosphorus that could impact surface or ground waters (e.g. soil, plant residue). This decision works against well-managed land in working landscapes like the winter wheat production areas of the High Plains. The bottom line is that *if an identified resource concern does not apply to a situation, then it is quite properly ignored*. We propose that, in the relatively few cases where the **CSP Water Quality Eligibility Tool** would result in a “false result,” planners should override the decision and insert language manually to explain why an application is being “passed,” despite not earning the required points for one or more concerns.

Examples for High Plains winter wheat situations might include:

1. **A.** Checking the box for Statement #1 “No Surface Water Transport from Field. . . .”
B. Include a written statement, such as:
*“This is a non-irrigated area in a low rainfall zone (xx” annual precipitation).
There is negligible surface runoff, with no impacts to surface or ground water.”*
2. If box #1 is not checked AND one of the point-deficient resource concerns DOES NOT APPLY to the application: (1) complete the form, (2) print out the case file copy, and (3) manually insert a statement on the printout that declares something on the order of:
“This application is considered to have PASSED the Water Quality Eligibility Tool. The “Phos-GW” resource concern was not passed using this tool; however no phosphorus is applied to the land, surface runoff and erosion is adequately controlled, and there is no risk to groundwater. In this case, common sense and professional judgment trumps the tool.”

If you have questions regarding this guidance, contact Eugene Backhaus, Resource Conservationist at eugene.backhaus@co.usda.gov , telephone 720-544-2868 or Gary Finstad, Resource Conservationist at gary.finstad@co.usda.gov , telephone 720-544-2820

/s/

ALLEN GREEN
State Conservationist

Dist: A, D (2006 CSP offices in CO and NE)

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